

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATASHA C., a minor,	:	CIVIL ACTION
individually, and by her	:	
father, GERALD C.,	:	
individually	:	
	:	
vs.	:	
	:	
VISIONQUEST, LTD.,	:	
VISIONQUEST NATIONAL, LTD,	:	
VISIONQUEST LODGEMAKERS, INC.,	:	
VISIONQUEST NONPROFIT	:	
CORPORATION, and	:	
DARRELL STEACH, an individual	:	
and in his official capacity	:	NO. 03-1903
of an employee of VisionQuest	:	

RULE 68 OFFER OF JUDGMENT

TO: Plaintiffs:
Natasha C., a minor, individually and by her father,
Gerald C. and Gerald C., individually

and

TO: Samuel H. Clark, Esquire
HOLSINGER, CLARK & ARMSTRONG, P.C.
832 Philadelphia Street
Indiana, PA 15701
and
Kelly B. Stapleton, Esquire
STAPLETON & STAPLETON
832 Philadelphia Street
Indiana, PA 15701

Attorneys for Plaintiff

Pursuant to Rule 68 of the Federal Rules of Civil Procedure,
Defendants hereby offer to allow judgment to be taken against
them by Plaintiffs, on all counts of the Complaint, in the lump
sum of \$50,000.00 (Fifty Thousand Dollars) which includes all

costs and fees. Plaintiffs shall not recover any attorneys' fees or costs separate from this offer. This offer of a money judgment is a settlement offer of this action only and said judgment herein to have no effect whatsoever except in settlement of this case.

This offer is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure and will be deemed withdrawn unless you serve a written notice of acceptance of the offer within 10 days of the date that it was served on you.

Dated: October 8, 2003

MARGOLIS EDELSTEIN

By: _____
Jonathan D. Herbst
Attorneys for Defendants
Attorney I.D. No. 09415
The Curtis Center, 4th Floor
Independence Square West
Philadelphia, PA 19106
(215) 922-1100

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Offer of Judgment was served upon the following parties by facsimile, regular mail and certified mail, return receipt requested, on October 8, 2003:

Samuel H. Clark, Esquire
HOLSINGER, CLARK & ARMSTRONG, P.C.
832 Philadelphia Street
Indiana, PA 15701

Kelly B. Stapleton, Esquire
STAPLETON & STAPLETON
832 Philadelphia Street
Indiana, PA 15701

MARGOLIS EDELSTEIN

By: _____
Jonathan D. Herbst
Attorneys for Defendant

ARLENE:

FAX, REGULAR MAIL, CERTIFIED MAIL RETURN RECEIPT
THIS OFFER GETS FILED OF
RECORD WITH A DISK AS REQUIRED BY THE FEDERAL COURT.